

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

KIMBERLY STARLING, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

NEWSMAX MEDIA, INC.,

Defendant.

Case No. 4:24-cv-00797-O

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO ANSWER,
MOVE, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Newsmax Media, Inc. (“Newsmax”), by its undersigned counsel, and without opposition from Plaintiff, moves the Court pursuant to Fed. R. Civ. P. 6(b) for an order extending Newsmax’s time to respond to the Complaint (Dkt. No. 1) by thirty days to October 10, 2024. In support of this Unopposed Motion, Newsmax states:

1. Plaintiff filed her Complaint on August 19, 2024 and served it on Newsmax on August 21, 2024. Thus, the deadline for Newsmax’s response to the Complaint is currently September 11, 2024.

2. Newsmax recently engaged outside counsel who are in the midst of investigating the facts underlying Plaintiff’s Complaint. Upon completion of this investigation, Newsmax and Plaintiff have agreed to discuss the information that Newsmax uncovers.

3. To allow time for Newsmax and its counsel to complete their investigation and the parties to discuss the results of that investigation, and in light of the intervening Labor Day holiday, as well as Newsmax’s attorneys’ pre-scheduled travel and the press of other matters, including an out-of-state, in-person hearing scheduled for September 4, 2024 in Michigan, Newsmax requires additional time to respond to respond to the Complaint.

4. This is Newsmax's first request for an extension of time to respond to the Complaint. The request is not made to delay the litigation of this case, and will not impact any trial or other deadlines in this matter. No party will be prejudiced by the requested extension.

Wherefore, Newsmax respectfully requests that the Court enter an order extending the deadline for Newsmax to respond to Plaintiff's Complaint to October 10, 2024.

Respectfully submitted,

STEPTOE LLP

/s/ Paul J. Stancil

Paul J. Stancil

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

In accordance with LR 7.1(a), the undersigned certifies that Newsmax's counsel has conferred with counsel for Plaintiff regarding this Unopposed Motion and the grounds for the requested relief. Plaintiff does not oppose the requested relief.

/s/ Paul J. Stancil

Paul J. Stancil

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 23, 2024, a copy of the foregoing document was electronically filed with the Clerk of the Court and served on all counsel of record via the CM/ECF system.

/s/ Paul J. Stancil

Paul J. Stancil